

2021 IIA MS Teams Conference Minutes

Revision of the Guidance for Processing COVID RIN requests without IIA Inspection

Date(s) Held: Thursday, February 25, 2021 (10:00 – 11:00)

Agenda

Welcome Remarks: PHH-33 Chief Duane Cassidy

Topic: Dialog concerning potential revisions of guidance on COVID Temporary Approval for RIN holders due to Travel and Quarantine Restrictions

IIA Attendees:

Thursday, February 25, 2021

- Erie Steigerwalt/ Steigerwalt Associates, Inc.
- Joe Cassidy/ Arrowhead Industrial Services, Inc.
- Duane Cassidy/PHMSA, Chief Pressure Vessels Branch
- Neil Benninghoven PHMSA, Transportation Specialist
- Diane Jones PHMSA, Transportation Specialist
- Kenneth Clark PHMSA, Transportation Specialist
- Tevin Frederick PHMSA, Honors Attorney
- Madison Saniuk PHMSA, Attorney Advisor

Meeting Begins:

The Pressure Vessels Branch Chief, Mr. Duane Cassidy welcomed the Independent Inspection Agency (IIA) participants gave remarks on the scope of the meeting:

Duane Cassidy-

- PHMSA was floating ideas about Implementing a remote inspection program with Field Services.
- Remote Inspections would be temporary
- Push back to IIA's. PHMSA would set guidelines on how IIA's provide recommendation for 1 year approval

Thursday, February 25, 2021 Questions and Comments:

Ernie Steigerwalt

License has pre-audit procedure spelled out. Inspectors support remote inspections for international. Domestic has not stopped. Airlines opened back up, no back log and have been doing training virtually and document checks.

Duane Cassidy- commented that although the pre-audit procedures are laid out in the IIA approval, remote inspection processes are not defined in the HMR or the IIA approval, and would most likely need to be reviewed and on file with PHMSA prior to implementation by the IIAs for DOT packaging inspection.

Joe Cassidy-

- international is the bigger issue due to travel restrictions and quarantine. Hot spots in early days restricted stateside travel but we are beyond that. Has not stopped Domestic Inspections. Program for remote inspections may possibly be a valuable tool. Commercial consideration of the technology being used inside of the client's locations. Prefers onsite inspections. No back log other than International.
- When PHMSA put in place the requirement to contact another IIA, clients reached out. They were able to visit if they have resources in that region that were able to travel. Remote Inspections is a complex question. Larger facilities have the IT support and capabilities and may be open to provide adequate tech to positively verify and witness. You can gain a lot of insight from the Pre-audit. Possibly providing a 2 year as opposed to a 5 year when a certain emergency situation exists that PHMSA activates.
- There are some technological challenges that need to be considered. Utilized remote inspection for non-dot inspections. HGV2 where witness is required and a lab was able to demonstrate they that the capabilities to provide the information needed. Digitally and paperwork wise through a remote inspection. Utilized June/July of last year. Request PHH-40 to reach out to IIA's to see the challenges they went through with it. Lighting was a factor in one inspection. Videoing you'll have refresh rate issues causing a fluttering image.

Duane Cassidy- refers to remote inspections possibly having implication later on down the line that it could get out of hand if authorized.

Possible use of the PHH-40 within the United States during emergency situations in lieu of IIA's, with some sort of modification. However, the use of PHMSA personnel would have to be defined.

PHMSA looks to draft and post an extension of the current waiver to expire April 15, 2021 for COVID, Temporary Approval. In the meantime, PHMSA will develop a way forward on this issue. PHMSA will not issue extensions indefinitely. There is an end game to this waiver policy. We are taking your input to assist in making a decision on this policy going forward. Thank you for attending, and we will reach out to you regarding the minutes of this meeting and the parking lot items. We request that you respond within 1-2 days with your comments on the parking lot items to approvals@dot.gov.

Parking Lot:

Do you have a remote inspection process drafted or in draft?

Do you have a back log (renewal)? How long is your company's back log of conducting inspections for renewal?

Are you as an IIA comfortable performing remote inspections should PHMSA go that direction?

Should action be taken at all or should PHMSA allow the waiver policy to expire April 15th? Do you have specific concerns/issues currently performing inspections Domestic vs. International? Do you recommend different policies domestically vs internationally?